Application No. 10/583,577 Reply to Office Action dated April 2, 2009

REMARKS

Claims 1-36 are pending. Claims 16 and 29 have been amended to correct informalities.

The Examiner rejected claims 1-36 as obvious over U.S. Patent No. 7,216,230 issued to Suzuki, et al., without citing a secondary reference. The Examiner's rejections are respectfully traversed.

As an initial matter, Suzuki does not appear to be an appropriate primary reference for rendering the claims obvious. Suzuki does not disclose a monolithic semiconductor device with a plurality of devices each having a unique identifier, and with multiple data paths along which data may flow between the plurality of devices and an external memory, let alone the use of unique identifiers to determine a data route. Instead, the cited portions of Suzuki appear to be directed to selectively encrypting based on the type of data packet and the transmission speed of a packet received from a remote device. Thus, Suzuki is not an appropriate primary reference. Moreover, to establish obviousness, the Examiner must either show that the prior art contains each element claimed or present a convincing line of reasoning as to why the skilled artisan would find the claims obvious in view of the teachings of the references. Here, the Examiner has not made a *prima facie* showing of obviousness because the Examiner has not shown that each element is present in Suzuki or presented a convincing line of reasoning as to why a missing element would be considered obvious.

Turning to the language of the claims, independent claim 1 recites, "[a] monolithic semiconductor integrated circuit for selectively encrypting or decrypting data, comprising: a plurality of devices each having a unique identifier; a cryptographic circuit arranged to encrypt or decrypt data; a plurality of selectable data routes formed from a plurality of data pathways, along which data may flow between the devices and an external memory, wherein at least one data route passes through the cryptographic circuit; and a control arranged to receive the unique identifier of a selected one of the devices transferring data, and to select one of the at least one data route that passes through the cryptographic circuit, or one of the at least one data route that does not pass through the cryptographic circuit, according to the unique identifier of

the selected device." The Examiner points to column 6, lines 14-34 and 38-45. The Examiner does not identify specific components in Suzuki that correspond to the recited "monolithic semiconductor," the recited "plurality of devices each having a unique identifier," or the recited "plurality of selectable data routes formed from a plurality of data pathways, along which data may flow between the devices and an external memory." As noted above, the Examiner admits that Suzuki does not expressly teach the recited "control arranged to receive the unique identifier of a selected one of the devices transferring data, and to select one of the at least one data route that passes through the cryptographic circuit, or one of the at least one data route that does not pass through the cryptographic circuit, according to the unique identifier of the selected device." Accordingly, claim 1 is not rendered obvious by Suzuki because Suzuki does not teach or otherwise render obvious the recited devices, data routes or control. Claim 1 is therefore allowable. Claims 2-15 depend from claim 1 and are allowable at least by virtue of their dependencies.

Independent claim 16 recites, "[a] method, comprising: transmitting data between one of a plurality of devices, the devices each having a unique identifier, and an external memory, the data being transmitted along one of a plurality of selectable data routes formed from a plurality of data pathways, wherein at least one data route passes through a cryptographic circuit and at least one data route does not pass through the cryptographic circuit; selectively encrypting or decrypting the transmitted data, the selectively encrypting or decrypting including: receiving the identification of a selected one of the devices; selecting a data route of the at least one data route that passes through the cryptographic circuit, or one of the at least one data route that does not pass through the cryptographic circuit, according to the unique identifier of the selected device." The Examiner points to the same portions of Suzuki relied upon to reject claim 1. The Examiner does not identify the "plurality of devices each having a unique identifier," or "the plurality of selectable data routes," and appears to concede that the "selecting a data route ... according to the unique identifier of the selected device" is not disclosed by Suzuki. Accordingly, the Examiner has failed to make a prima facie showing of obviousness. Thus, claim 16 is not rendered obvious by Suzuki. Claims 17-28 depend from claim 16 and are allowable at least by virtue of their dependencies.

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Independent claim 29 recites, "[a] system, comprising: an external memory; and a monolithic semiconductor integrated circuit for selectively encrypting or decrypting data, the semiconductor integrated circuit including: a plurality of devices each having a unique identifier; a cryptographic circuit arranged to encrypt or decrypt data; a plurality of selectable data routes formed from a plurality of data pathways, along which data may flow between the devices and the external memory, wherein at least one data route passes through the cryptographic circuit and at least one data route does not pass through the cryptographic circuit; and a control arranged to receive the unique identifier of a selected one of the devices transferring data, and to select one of the at least one data route that passes through the cryptographic circuit, or one of the at least one data route that does not pass through the cryptographic circuit, according to the unique identifier of the selected device." The Examiner relies on the arguments made with respect to claim 1. The Examiner does not identify specific components in Suzuki that correspond to the recited "monolithic semiconductor," the recited "plurality of devices each having a unique identifier," or the recited "plurality of selectable data routes formed from a plurality of data pathways, along which data may flow between the devices and an external memory." As noted above, the Examiner admits that Suzuki does not expressly teach the recited "control arranged to receive the unique identifier of a selected one of the devices transferring data, and to select one of the at least one data route that passes through the cryptographic circuit, or one of the at least one data route that does not pass through the cryptographic circuit, according to the unique identifier of the selected device." Accordingly, claim 29 is not rendered obvious by Suzuki because Suzuki does not teach or otherwise render obvious the recited devices, data routes or control. Claim 29 is therefore allowable. Claims 30-36 depend from claim 29 and are allowable at least by virtue of their dependencies.

The Director is authorized to charge any additional fees due by way of this Amendment, or credit any overpayment, to our Deposit Account No. 19-1090. Application No. 10/583,577 Reply to Office Action dated April 2, 2009

All of the claims remaining in the application are now clearly allowable. Favorable consideration and a Notice of Allowance are earnestly solicited.

Respectfully submitted,
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